



# South Coast Air Quality Management District

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**FAXED: DECEMBER 22, 2005**

December 22, 2005

Ms. Angela Reynolds  
City of Long Beach  
Planning and Building Department  
333 West Ocean Blvd.,  
Long Beach, CA 90802

Dear Ms. Reynolds:

**Draft Environmental Impact Report (DEIR) for  
Long Beach Airport Terminal Area Improvement Project, November 2005**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

A handwritten signature in black ink that reads "Steve Smith". The signature is written in a cursive, flowing style.

Steve Smith, Ph.D.  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS: CB

LACO51108-03  
Control Number

**Draft Environmental Impact Report (DEIR) for  
Long Beach Airport Terminal Area Improvement Project**

1. **Health Risk Assessment (HRA) and Hot Spots Analysis:** The carbon monoxide hot spots impacts are presented in tables 4-2 through 4-6 in Appendix C. It is stated that the CALINE4 model is utilized for the analysis. However, the model output was not provided in the Appendix for review. As a result, SCAQMD staff could not verify the input parameters and the model output.

The air quality impacts for criteria pollutants are presented in table 3.2-13 in the DEIR and Table 4-7 in Appendix C. It is stated that the EDMS/AERMOD model was used for the analysis. However, the model output was not provided for review. As a result, SCAQMD staff could not verify the results.

The health risks impacts are presented in Tables 3.2-15 through 3.2-20 in the DEIR and Tables 4-8 and 4-9 in the Appendix. It is stated that the AERMOD model was used for the analysis. The model output and spreadsheets were not provided in the DEIR or the Appendix for review. As a result, SCAQMD staff could not verify the results.

2. **Mitigating Construction Emissions:** Construction NO<sub>x</sub> and VOC emissions will remain significant even after the implementation of the proposed mitigation measures listed on pages 3.2-56 and 3.2-57 of the DEIR. To further reduce construction emissions SCAQMD staff recommends that the lead agency consider the following mitigation measures for implementation where feasible:

- Provide on-site lunch trucks /facilities during construction to reduce off-site worker vehicle trips.
- Prohibit parking of construction vehicles on streets adjacent to residences, schools, daycare centers, convalescent homes and hospitals.
- Prohibit construction vehicles idling in excess of five minutes to be consistent with State law.
- Suspend use of all construction equipment during a first-stage smog alert.
- Designate a person who will ensure implementation of the proposed mitigation measures through direct inspection and investigation of complaints. Project proponent should also provide a telephone number that residents may call should they have complaints regarding and construction nuisance.

To reduce volatile organic compounds (VOC) emissions, SCAQMD staff recommends the following mitigation measures:

- Use zero VOC content architectural coatings on buildings.
- Restrict the number of gallons of coatings used per day.
- Encourage water-based coatings or other low-emitting alternatives.
- Paint contractors should use hand applications instead of spray guns.

3. **Mitigating Operational Emissions:** In MM 3.2-15 on page 3.2-58 of the DEIR, the lead agency proposes to require the airlines to comply with the South Coast Ground Service Equipment (GSE) Memorandum of Understanding (MOU) signed by the airlines and California Air Resources Board (CARB) in December 2002 or replacement agreements and/or regulations. The DEIR discloses that the GSE MOU includes provisions for retrofitting diesel GSE with particulate traps where feasible.

SCAQMD staff recommends that the lead agency pursue other low emission technologies in addition to retrofitting diesel GSE with particulate traps. For example, SCAQMD staff recommends converting the ground support equipment to low or zero-emission technology, such as the use of CNG or any other clean fuel technology available.

To reduce emissions from ground access vehicles, SCAQMD staff recommends that the lead agency provide incentives or require commercial vehicles, i.e., cars, vans and trucks, that use the terminal areas to install low-emitting engines or use clean fuel.